

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

M1 HOLDINGS INC.,

Plaintiff,

v.

MEMBERS 1ST

FEDERAL CREDIT UNION,

Defendant.

MEMBERS 1ST

FEDERAL CREDIT UNION,

Counter-Claimant,

v.

M1 HOLDINGS INC. and

LINCOLN SAVINGS BANK,

Counter-Defendants.

Case No. 22 cv 01162

Judge: Hon. Franklin U. Valderrama

Magistrate Judge: Hon. Jeffrey Cole

Jury Trial Demanded

JOINT STATUS REPORT

Plaintiff/Counter-Defendant M1 Holdings Inc. (“M1 Holdings”), Counter-Defendant Lincoln Savings Bank (“Lincoln Savings”), and Defendant/Counter-Claimant Members 1st Federal Credit Union (“Members 1st”) submit this Status Report pursuant to the Court’s Order dated December 13, 2022 (Dkt No. 37).

Progress Of Discovery

The parties continue to exchange written discovery, written discovery responses, and documents. On July 31, 2023, the parties participated in a meet and confer regarding purported deficiencies raised against them. In an effort to avoid bringing these issues before the Court, the parties agreed to supplement their responses and document productions and are working toward that goal. Once supplementation is complete and the parties have an opportunity to analyze the new materials, the parties can revisit any remaining discovery issues. The parties remain hopeful

they will continue to resolve their discovery disputes without intervention from the Court.

New Parties

On August 2, 2023, Members 1st filed a *Partially Unopposed Motion for Leave to File First Amended Counterclaims and Extend Case Deadlines*. (Dkt No. 52). Per this Court's scheduling order, M1 Holdings filed its response on August 16, 2023 and Members 1st will file a reply by August 23, 2023. (Dkt No. 53). Upon this Court's ruling, at least some parties will be added to the lawsuit and additional discovery likely will be needed. With that expectation, and because the portion of the motion seeking a discovery extension was unopposed, the Court extended the existing discovery deadlines by two months. (Dkt Nos. 54 & 55).

Dated: August 21, 2023

Respectfully Submitted,

<p><u>/s/ Peter G. Hawkins</u></p> <p>Douglas A. Albritton Stacy A. Baim Peter G. Hawkins Actuate Law, LLC 641 W. Lake Street, Fifth Floor Chicago, IL 60661 (312) 579-3108 doug.albritton@actuatelaw.com stacy.baim@actuatelaw.com peter.hawkins@actuatelaw.com</p> <p><i>Counsel for Plaintiff/Counter-Defendant M1 Holdings Inc., and Counter-Defendant Lincoln Savings Bank</i></p>	<p><u>/s/ Patricia M. Flanagan</u></p> <p>Patricia M. Flanagan (<i>pro hac vice</i>) Adam Wolek Fox Rothschild LLP 777 South Flagler Drive Suite 1700, West Tower West Palm Beach, FL 33401 (312) 517-9299 pflanagan@foxrothschild.com awolek@foxrothschild.com</p> <p><i>Counsel for Defendant/Counter-Plaintiff Members 1st Federal Credit Union</i></p>
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CERTIFICATE OF SERVICE

This is to certify that on August 21, 2023, a copy of the foregoing document has been filed through the Court's electronic filing system and thereby served on all counsel of record.

By: /s/ Peter G. Hawkins
*Counsel for Plaintiff/Counter-
Defendant M1 Holdings Inc., and
Counter-Defendant Lincoln Savings
Bank*